

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL INC. and	)	
HONEYWELL INTELLECTUAL PROPERTIES INC.,	)	
	)	C.A. No. 04-1338-KAJ
Plaintiffs,	)	
	)	
v.	)	
	)	
APPLE COMPUTER, INC., et al.,	)	
	)	
Defendants.	)	
	)	
HONEYWELL INTERNATIONAL INC. and	)	
HONEYWELL INTELLECTUAL PROPERTIES INC.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 05-874-KAJ
	)	
CITIZEN WATCH CO., LTD. and CITIZEN	)	
DISPLAYS CO., LTD.,	)	
	)	
Defendants.	)	

**JOINT MOTION AND ORDER FOR CONSOLIDATION**

Pursuant to Fed. R. Civ. P. 42(a), Plaintiffs Honeywell International Inc. and Honeywell Intellectual Properties Inc. ("Honeywell") and Defendants Citizen Watch Co., Ltd. and Citizen Displays Co., Ltd. ("Citizen") hereby move for an order consolidating *Honeywell v. Citizen*, C.A. No. 05-874 (KAJ) and *Honeywell v. Apple Computer, Inc., et al.*, C.A. No. 04-1338 (KAJ) for all purposes on the grounds that both cases involve common questions of law and fact.

Honeywell and Citizen request that the civil action number of the consolidated cases be C.A. No. 04-1338 (consolidated), that the Scheduling Order entered in that action apply to the consolidated cases, and that all papers be hereafter filed in C.A. No. 04-1338.

MORRIS, NICHOLS, ARSHT & TUNNELL  
LLP

*/s/ Leslie A. Polizoti*

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SO ORDERED this \_\_\_\_ day of March, 2006.

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United States District Judge

**CERTIFICATE PURSUANT TO LOCAL RULE 7.1.1**

I hereby certify, pursuant to D. Del. LR 7.1.1, that the subject of the foregoing motion has been discussed with counsel for the Manufacturer Defendants. The following Manufacturer Defendants have consented to this motion: Samsung SDI, Sony, Quanta Display, Fuji, Seiko Epson, SEID, Optrex, Matsushita and Arima Display. Plaintiffs' counsel has not received a response from BOE Hydis, HannStar, Hitachi, ID Tech, Philips, Toppoly, Wintek, or Casio.

/s/ Leslie A. Polizoti (#4299)

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CERTIFICATE OF SERVICE

I hereby certify that on March 10, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification of such filing to the following: John R. Alison, Parker H. Bagley, Robert J. Benson, Robert Karl Beste, III, Elizabeth L. Brann, John M. Caracappa, Christopher E. Chalsen, Arthur G. Connolly, III, Frederick L. Cottrell, III, Francis DiGiovanni, Thomas M. Dunham, Amy Elizabeth Evans, York M. Faulkner, Christopher J. Gaspar, Alexander E. Gasser, Alan M. Grimaldi, Thomas C. Grimm, Thomas Lee Halkowski, Richard L. Horwitz, John T. Johnson, Robert J. Katzenstein, Nelson M. Kee, Richard D. Kelly, Stephen S. Korniczky, Hamilton Loeb, Robert Maier, David J. Margules, David Ellis Moore, Carolyn E. Morris, Arthur I. Neustadt, Elizabeth A. Niemeyer, Kevin M. O'Brien, Gerard M. O'Rourke, Andrew M. Ollis, Karen L. Pascale, Adam Wyatt Poff, Leslie A. Polizoti, Alana A. Prills, Steven J. Rizzi, Avelyn M. Ross, Philip A. Rovner, Robert C. Scheinfeld, Carl E. Schlier, John M. Seaman, Chad Michael Shandler, John W. Shaw, Neil P. Sirota, Monte Terrell Squire, William J. Wade, Roderick B. Williams and Edward R. Yoches.

I also certify that on March 10, 2006, I caused to be served true and correct copies of the foregoing document on the following by hand:

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